

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

IN RE: MICHELE ANNE WASHINGTON,) CHAPTER 13  
  )  
  )  
Debtor,                            ) CASE NO. 20-03482-DD

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TITLEMAX OF SOUTH CAROLINA, )  
INC.                               )  
                                    )  
Movant,                          ) CONTESTED MATTER  
                                    )  
vs.                               )  
                                    )  
MICHELE ANNE WASHINGTON,     )  
GARY A WASHINGTON, and       )  
PAMELA SIMMONS-BEASLEY, Trustee, )  
                                    )  
Respondents.                   )

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

TO: DEBTOR, TRUSTEE (if applicable), AND THOSE NAMED IN THE ATTACHED MOTION

PLEASE TAKE NOTICE THAT a hearing will be held on the attached motion on:

Date: 8/5/2021

Time: 10:00 AM

Place: J. Bratton Davis U.S. Bankruptcy Courthouse, 1100 Laurel Street, Columbia, SC 29201

Within fourteen (14) days after service of the attached motion, the notice of motion, the movant's certification of facts, (and a blank certification of facts form, applicable only to motions for relief from the automatic stay and for service on *pro se* parties only), any party objecting to the relief sought shall:

- (1) File with the Court a written objection to the 11 U.S.C. § 362 Motion;
- (2) File with the Court a certification of facts (for motions for relief from the automatic stay);
- (3) Serve on the movant items 1 and 2 above at the address shown below; and
- (4) File a certificate of such service with the Court.

If you fail to comply with this procedure, you may be denied the opportunity to appear and be heard on this proceeding before the Court.

Date: 6/27/2021

/s/ Nathan E. Huff  
Nathan E. Huff  
SC District ID No. 12311

1223 George C. Wilson Dr.  
Augusta, GA 30909  
(706) 860-9995  
[nhuff@cwhllp.com](mailto:nhuff@cwhllp.com)

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MICHELE ANNE WASHINGTON, )  
GARY A WASHINGTON, and )  
PAMELA SIMMONS-BEASLEY, Trustee, )  
                                       )  
Respondents. )

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this day he has served the foregoing on the following (if by U.S. Mail, with proper postage affixed thereto):

Michele Anne Washington  
1324 Furman Dr.  
Sumter, SC 29154

Paul L. Held, Esq.  
*Electronically via ECF*

Pamela Simmons-Beasley, Trustee  
*Electronically via ECF*

Gary A. Washington  
1324 Furman Dr.  
Sumter, SC 29154

This 27<sup>th</sup> day of June, 2021.

/s/ Nathan E. Huff  
Attorney for Movant